

EARLY CHILDHOOD DEVELOPMENT CENTER LEGISLATIVE COALITION

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Dr. William J. Tobin
Executive Director

April 5, 1996

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

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RE: NPRM Concerning Universal Service
Issues Associated with Telecommunications
Act of 1996--CC Docket 96-45

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Dear Chairman and Commissioners:

I am providing comments on the above indicated NPRM on behalf of the Early Childhood Development Center Legislative Coalition which represents the licensed private and religious childcare centers of the United States. These centers number approximately 80,000 and care for almost 5 Million youngsters between infancy and 5 years of age.

We would like to focus our comments on Section IV of the NPRM dealing with schools, libraries and health care providers.

It does not appear that early childhood development centers and programs would be covered under the provisions to provide universal service access at discounted rates. This is a glaring oversight and omission, especially with the explosive growth in the number of children currently in these pre-school programs and the anticipated continued growth due to birth rates, the number of women entering the workplace, and the increase in the need for childcare due to reforms in Federal and State welfare programs.

These children and the early childhood programs they attend will be severely disadvantaged if they cannot be assured of universal and affordable connectivity for telecommunications and other advanced services similar to those guaranteed to schools, libraries, and health care services. These services range from voice grade access to the public switched telecommunications network, touchtone

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and access to emergency services, to the advanced data and digital services for computer access and applications.

We base our arguments also on the following facts:

1) early childhood programs also must have access to timely health care and emergency services;

2) they are engaged in the pursuit of the First National Educational Goal--that children enter school ready to learn, which requires that they grow and learn aided by modern technologies, and

3) similar to their older siblings in more formal schooling they will rely more and more on computer applications and the need to access library and other learning resources such as the Internet, and the teaching personnel should have access to resources and professional development services.

If the interpretation of Section 101, §254 (h)(1)(B) of the Telecommunications Act of 1996 is such that it encompasses pre-schools attached to elementary schools, logically, universal discounted access also should be extended to stand-alone pre-school and early childhood care programs.

Moreover, since these early childhood programs are to be found everywhere throughout the U.S., the concerns about rural and low-income/high-cost areas also should be applicable. (Cf. Part III)

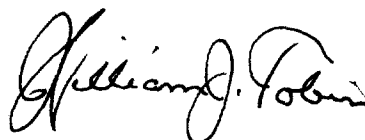
Finally, since early childhood programs operate on very restricted revenue margins, any references to whether or not they enjoy for- or not-for-profit tax status should not be applicable. Certainly, the references to school endowments in excess of \$50 Million certainly would indicate that early childhood programs are by no means anywhere near that category. By description, the average center has a licensed capacity of 75+ children between infancy and 5-years of age. If they prefer for personal or professional reasons in a taxpaying capacity, this should not result in penalizing the children under care. The

term "for-profit" as applied to early childhood and childcare programs is a misnomer. Every center or program has to generate an excess of revenues over expenses or it will cease operation. What is excess revenue in so-called tax-exempt (or non-taxpaying centers) are the same (or less) as the so-called "profits" of the taxpaying centers.

If a technical clarification is needed to include these programs so vital to the family and moral structure of our country, we urgently request a clear declaration of their eligibility. Only in this manner, it seems, can this unfortunate and apparently unforeseen inequity be remedied.

Thank you for your attention and heed to our concerns.

Cordially,

A handwritten signature in cursive script, reading "William J. Tobin". The signature is fluid and elegant, with the first name "William" being the most prominent part.

Dr. William J. Tobin
Executive Director